

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

VLADISLAV KLYUSHIN,
a/k/a "Vladislav Kliushin"
IVAN ERMAKOV,
a/k/a "Ivan Yermakov", and
NIKOLAI RUMIANTCEV,
a/k/a "Nikolay Rumyantcev"

Defendants.

Criminal No. 21-10104-PBS

STIPULATION #2

The parties hereby stipulate and agree that defendant Vladislav Klyushin was married to Zhannetta Klyushina, who is also known as Zhanna Klyushina, at all times relevant to the charges in the Indictment. This stipulation is admissible in evidence.

Respectfully submitted,

VLADISLAV KLYUSHIN
Defendant

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Maksim Nemtsev
MAKSIM NEMTSEV
MARC FERNICH
Counsel for Defendant

/s/ Stephen E. Frank
STEPHEN E. FRANK
SETH B. KOSTO
Assistant United States Attorneys

January 23, 2023